

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
JUN 6 2007

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

'07 JUN -6 A9:27

Dianne Hill-Krotz
5510 64th Ave. Apt. 108
Kenosha, WI 53144

Plaintiff,

v.

The Northland Group, Inc.
c/o CT Corporation System,
Registered Agent
8025 Excelsior Drive Suite 200
Madison, WI 53717

Defendant.

CASE NO.:

JUDGE:

07-c-0522

**COMPLAINT FOR DAMAGES UNDER
THE FAIR DEBT COLLECTION
PRACTICES ACT AND OTHER
EQUITABLE RELIEF**

JURY DEMAND ENDORSED HEREIN

JURISDICTION AND VENUE

1. Jurisdiction is founded on 28 U.S.C. §1331 pursuant to the Fair Debt Collections Practices Act (FDCPA), 15 U.S.C. §1692. Venue is proper in this district because this is the judicial district where all of the events giving rise to the cause of action took place.

FACTS COMMON TO ALL COUNTS

2. The Plaintiff is a person who incurred a consumer debt primarily for personal, family or household purposes.
3. Defendant is a corporation doing business primarily as a consumer debt collector.
4. Defendant is a debt collector as defined by the FDCPA, 15 U.S.C. §1692a(6).
5. The Plaintiff is a consumer as defined by 15 U.S.C. §1692a(3).
6. The debt in question qualifies as a debt as defined by 15 U.S.C. §1692a(5).

7. Defendant is either the holder of the debt or was retained by the current holder to collect the debt.
8. All of Defendant's actions occurred within one year of the date of this Complaint.
9. On approximately December 15th, 2006, Plaintiff informed Defendant that she had retained Legal Helpers, P.C. to file a bankruptcy, gave contact information for Legal Helpers, P.C., and requested that all future communications regarding her debt be directed to Legal Helpers, P.C.
10. Despite Plaintiff's notice of representation for her debt, Defendant sent Plaintiff a letter regarding her debt dated December 21, 2006.
11. Despite Plaintiff's notice of representation for her debt, Defendant sent Plaintiff a letter regarding her debt dated January 5, 2007.
12. Despite Plaintiff's notice of representation for her debt, Defendant sent Plaintiff a letter regarding her debt dated February 21, 2007.
13. Despite Plaintiff's notice of representation for her debt, Defendant sent Plaintiff a letter regarding her debt dated March 17, 2007.
14. Defendant Violated the FDCPA.

COUNT ONE

Violation of the Fair Debt Collections Practices Act

15. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.
16. The Defendant violated 15 U.S.C. §1692c in that it contacted Plaintiff notwithstanding the fact that Plaintiff told Defendant that Plaintiff was represented by an attorney.

COUNT TWO

Violation of the Fair Debt Collections Practices Act

17. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.

18. The Defendant violated 15 U.S.C. §1692f in that its actions were unfair and/or
unconscionable means to collect a debt.

JURY DEMAND

19. Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

20. Plaintiff prays for the following relief:

- a. Judgment against defendant for actual damages, statutory damages
pursuant to 15 U.S.C. §1692k and costs, and reasonable attorney's fees
pursuant to 15 U.S.C. §1692k.
- b. For such other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Legal Helpers, P.C.

By: _____

Jeffrey S. Hyslip
Attorney for Plaintiff
20 West Kinzie; Suite 1300
Chicago, IL 60610
Telephone: 312-753-7536
jsh@legalhelpers.com